



JAMES E. JOHNSON
Corporation Counsel


THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MARTIN BOWE
Senior Counsel
Tel: (212) 356-0894

February 17, 2021

VIA ECF and facsimile

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The conference is adjourned to
March 5, 2021, and will not be
adjourned again.
X 

Re: *R.R. obo J.V.R. v. N.Y.C. Dep't of Educ.*, 20-cv-5541(AKH)(KNF)

2/18/2021

Dear Judge Hellerstein:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, supervising attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a three-week adjournment of the conference scheduled for February 19, 2021, to March 12, 2021, or to a date convenient for the Court. This is the second request for an adjournment of a conference in this case. The need for the extension is to complete Defendant's internal settlement authority process and then enter settlement negotiations. I have informed Plaintiff that the City will present a settlement offer before or by February 26. I requested Plaintiff's consent to this request yesterday, but have not received a response as the filing of this letter. Defendant apologizes for not having submitted this request by 10:00 a.m. today and any inconvenience for the Court; we had hoped to submit this request late yesterday on consent.

In the event the parties cannot reach settlement by March 10, 2021, we propose submission of a next joint status report, on or before March 10, either requesting the assistance of Magistrate Judge Fox with possible settlement, or to submit a proposed briefing schedule.

Accordingly, Defendant respectfully requests that the conference be adjourned to March 12 or a date thereafter convenient for the Court.

Thank you for considering this request.

Respectfully submitted,

/s/

Martin Bowe
Senior Counsel

cc: Kate Cassidy, Esq. and Rebecca Shore, Esq. (Via ECF)